

Matthew M. Boley (8536)
Benjamin J. Kotter (9592)
COHNE KINGHORN, P.C.
111 East Broadway, 11th Floor
Salt Lake City, Utah 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378
Email: mboleym@cohnekinghorn.com
bkotter@cohnekinghorn.com

Proposed attorneys for debtor-in-possession Camperworld Business Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

**CAMPERWORLD BUSINESS
TRUST,**

Debtor.

Bankruptcy Case No. 15-20383

Chapter 11

Honorable William T. Thurman

***EX PARTE* MOTION FOR ORDER ALLOWING THE DEBTOR TO FILE
SCHEDULE G AND EQUITY SECURITY HOLDERS LIST UNDER SEAL**

In accordance with Local Rule 5003-2, the debtor and debtor-in-possession Camperworld Business Trust (the “Debtor”), through its undersigned counsel Cohne Kinghorn, P.C.,¹ respectfully moves the court *ex parte* to enter an order, substantially in the form filed concurrently herewith, allowing the Debtor file under seal its Schedule G – Executory Contracts and Unexpired Leases (“Schedule G”) and List of Equity Security Holders required by Rule

¹ Parsons Kinghorn Harris, P.C. and Cohne Rappaport & Segal, P.C. merged on February 17, 2015 and are now operating under the name “Cohne Kinghorn, P.C.”

1007(a)(3) (the “Equity Security Holders List”). In support of this *ex parte* motion, the Debtor represents as follows:

1. Local Rule 5003-2(c) provides that “[a] motion to filed documents under seal may be filed electronically unless prohibited by law. The order of the court authorizing the filing of papers under seal may be filed electronically unless prohibited by law.”

2. Schedule G requires the Debtor to publicly disclose “all executory contracts of any nature and all unexpired leases of real or personal property” together with “the names and complete mailing address of all other parties to each lease or contract described.” *See* Form Schedule G instructions.

3. Rule 1007(a)(3) of the Federal Rules of Bankruptcy Procedure requires the Debtor to file “a list of the Debtor’s equity security holders of each class showing the number and kind of interests registered in the name of each holder, and the last known address of place of business of each holder.”

4. The information contained on Schedule G and the Debtor’s Equity Security Holders List is proprietary and, the Debtor believes, may have significant value to the bankruptcy estate. However, the public disclosure of this information will significantly erode if not destroy any value for the bankruptcy estate.

5. Accordingly, the Debtor respectfully requests the Court’s authorization to file its Schedule G and Equity Security Holders List under seal.

WHEREFORE, the Debtor respectfully requests entry of an order granting this *ex parte* motion in the form submitted concurrently herewith.

DATED this 17th day of February, 2015.

COHNE KINGHORN, P.C.

/s/ Benjamin J. Kotter
Matthew M. Boley
Benjamin J. Kotter
Proposed Attorneys for the Debtor and Debtor-in-Possession Camperworld Business Trust